

Defendants respond to the numbered paragraphs of the Complaint as follows:

1. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 1 of the Complaint concerning the citizenship of the parties. Therefore, Defendants deny the allegations made.

2. Defendants deny venue is proper in this Court.

3. Defendant do not have information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 3 that this Court has personal jurisdiction over all Defendants. Therefore, deny this allegation. Defendants admit Druien, Inc. is a Texas Corporation who registered agent is Emmett Druien. Defendants deny they had a checking account at First National Bank. Defendants do not have information or knowledge sufficient at this time to form a belief as to the trust of the allegation Lisa Druien notarized at least one assignment as stated in Paragraph 3 of the Complaint. Therefore, deny this allegation. Defendants admit they had contacts with Michael Vernon Garrison d/b/a Rock Hill Used Cars and Austin Michael Garrison a/k/a Mike Garrison d/b/a Austin Financial Services. Defendants are without information or knowledge sufficient at this time to form a belief as to the trust of allegation of the residence and business conduct of Michael Vernon Garrison d/b/a Rock Hill Used Cars and Austin Michael Garrison a/k/a Mike Garrison d/b/a Austin Financial Services. Therefore, deny said allegation.

4. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 4 of the Compliant and therefore deny the allegation(s).

5. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 5 of the Compliant and therefore deny the allegation(s).

6. Defendants admit the allegations made in Paragraph 6 of the Complaint.

7. Defendants admit the allegations made in Paragraph 7 of the Complaint.

8. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 8 of the Complaint and therefore deny the allegation(s).

9. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 9 of the Complaint and therefore deny the allegation(s).

10. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 10 of the Complaint and therefore deny the allegation(s).

11. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 11 of the Complaint and therefore deny the allegation(s).

12. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 12 of the Complaint and therefore deny the allegation(s).

13. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 13 of the Complaint and therefore deny the allegation(s).

14. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 14 of the Complaint and therefore deny the allegation(s).

15. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 15 of the Compliant and therefore deny the allegation(s).

16. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 16 of the Compliant and therefore deny the allegation(s).

17. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 17 of the Compliant and therefore deny the allegation(s).

18. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 18 of the Compliant and therefore deny the allegation(s).

19. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 19 of the Compliant and therefore deny the allegation(s).

20. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 20 of the Compliant and therefore deny the allegation(s).

21. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 21 of the Compliant and therefore deny the allegation(s).

22. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 22 of the Compliant and therefore deny the allegation(s).

23. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 23 of the Compliant and therefore deny the allegation(s).

24. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 24 of the Compliant and therefore deny the allegation(s).

25. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 25 of the Compliant and therefore deny the allegation(s).

26. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 26 of the Compliant and therefore deny the allegation(s).

27. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 27 of the Compliant and therefore deny the allegation(s).

28. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 28 of the Compliant and therefore deny the allegation(s).

29. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 29 of the Compliant and therefore deny the allegation(s).

30. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 30 of the Compliant and therefore deny the allegation(s).

31. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 31 of the Compliant and therefore deny the allegation(s).

32. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 32 of the Compliant and therefore deny the allegation(s).

33. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 33 of the Compliant and therefore deny the allegation(s).

34. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 34 of the Compliant and therefore deny the allegation(s).

35. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 35 of the Compliant and therefore deny the allegation(s).

36. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 36 of the Compliant and therefore deny the allegation(s).

37. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 37 of the Compliant and therefore deny the allegation(s).

38. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 38 of the Compliant and therefore deny the allegation(s).

39. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 39 of the Compliant and therefore deny the allegation(s).

40. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 40 of the Compliant and therefore deny the allegation(s).

41. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 41 of the Compliant and therefore deny the allegation(s).

42. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 42 of the Compliant and therefore deny the allegation(s).

43. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 43 of the Compliant and therefore deny the allegation(s).

44. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 44 of the Compliant and therefore deny the allegation(s).

45. Defendants admit the allegation in Paragraph 45 of the Complaint.

46. Defendants admit the allegations in Paragraph 46 of the Complaint.

47. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 47 of the Complaint regarding the authenticity of what Plaintiff claims is a paragraph of the Funding Agreement, therefore Defendants deny the

allegations. Further, Defendants deny the allegations it represented and warranted as stated in Paragraph 47 of the Complaint.

48. Defendants admit Exhibit J to the Complaint may be a funding agreement, but Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 48 of the Complaint that the attached marked as Exhibit J is a true and correct copy of any agreement between the parties and therefore deny said allegations.

49. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 43 of the Complaint and therefore deny the allegation(s).

50. Defendants deny the allegations in Paragraph 50 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

51. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 51 of the Complaint that the attached marked as Exhibit J and Exhibit D are a true and correct copies of any agreement or documents between the parties and therefore deny said allegations. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

52. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 52 of the Complaint and therefore deny the allegation(s). Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

53. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 53 of the Complaint and therefore deny the

allegation(s). Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

54. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 54 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement or documents between the parties and therefore deny said allegations. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and the allegations accusing Defendants of wrongdoing to actions that were the cause of financial harm to Plaintiff.

55. Defendants deny the allegations in Paragraph 55 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

56. Defendants deny the allegations in Paragraph 56 of the Complaint.

57. Defendants deny the allegations in Paragraph 57 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

58. Defendants deny the allegations in Paragraph 58 of the Complaint. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 58 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement or documents between the parties and therefore deny said allegations. Defendants further deny the allegations accusing Defendants of wrongdoing to actions that were the cause of financial harm to Plaintiff.

59. Defendants deny the allegations in Paragraph 59 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

60. Defendants admit the allegations in Paragraph 60 of the Complaint.

61. Defendants admit the allegations in Paragraph 61 of the Complaint.

62. Defendants deny the allegations in Paragraph 62 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

63. Defendants deny the allegations in Paragraph 63 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 63 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement or documents between the parties and therefore deny said allegations.

64. Defendants deny the allegations in Paragraph 64 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 64 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement or documents between the parties and therefore deny said allegations.

65. Defendants deny the allegations in Paragraph 65 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

66. Defendants deny the allegations in Paragraph 66 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

67. Defendants deny the allegations in Paragraph 67 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

68. Defendants deny the allegations in Paragraph 68 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and deny Defendants colluded with anyone as alleged in Paragraph 68.

69. Defendants deny the allegations in Paragraph 69 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

70. Defendants deny the allegations in Paragraph 70 of the Complaint. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 70 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement or documents between the parties and therefore deny said allegations. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and the allegations accusing Defendants of wrongdoing to actions that were the cause of financial harm to Plaintiff.

71. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 71 of the Complaint and therefore deny. Defendants are further without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 71 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement or documents between the parties and therefore deny said allegations. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles.

72. Defendants deny the allegations in Paragraph 72 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 72 of the Complaint that the attached marked as Exhibit D is a true and correct copy of any agreement between the parties and therefore deny said allegations.

73. Defendants deny the allegations in Paragraph 73 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as Insider Fraud Vehicles.

74. Defendants deny the allegations in Paragraph 74 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as Insider Fraud Vehicles.

75. Defendants deny the allegations in Paragraph 75 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as Insider Fraud Vehicles.

76. Defendants deny the allegations in Paragraph 76 of the Complaint.

77. Defendants deny the allegations in Paragraph 77 of the Complaint.

78. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 78 of the Complaint and therefore deny the allegation(s). Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as Insider Fraud Vehicles.

79. Defendants deny the allegations in Paragraph 79 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as Insider Fraud Vehicles.

80. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 80 of the Complaint and therefore deny the allegation(s).

81. Defendants deny the allegations in Paragraph 81 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles.

82. Defendants deny the allegations in Paragraph 82 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 82 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement between the parties and therefore deny said allegations.

83. Defendants deny the allegations in Paragraph 83 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles.

84. Defendants deny the allegations in Paragraph 84 of the Complaint. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 82 of the Complaint that the attached marked as Exhibit K is a true and correct copy of any agreement between the parties and therefore deny said allegations.

85. Defendants deny the allegations in Paragraph 85 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles.

86. Defendants deny the allegations in Paragraph 86 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles.

87. Defendants deny the allegations in Paragraph 87 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles.

88. Defendants deny the allegations in Paragraph 88 of the Complaint. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as NG Fraud Vehicles and Insider Fraud Vehicles and deny Defendants colluded with anyone as alleged in Paragraph 88.

89. Paragraph 89 of the Complaint sets forth no allegations to which a response is required.

90. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 90 of the Complaint and therefore deny the allegation(s).

91. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 91 of the Complaint and therefore deny the allegation(s). Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 91 of the Complaint that the attached marked as Exhibit L is a true and correct copy of any agreement between the parties and therefore deny said allegations.

92. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 92 of the Complaint and therefore deny the allegation(s).

93. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 93 of the Compliant and therefore deny the allegation(s).

94. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 94 of the Compliant and therefore deny the allegation(s). Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 94 of the Complaint that the attached marked as Exhibit M is a true and correct copy of any agreement between the parties and therefore deny said allegations.

95. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 95 of the Compliant and therefore deny the allegation(s). Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 95 of the Complaint that the attached marked as Exhibit N is a true and correct copy of any agreement between the parties and therefore deny said allegations.

96. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 96 of the Compliant and therefore deny the allegation(s).

97. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 97 of the Compliant and therefore deny the allegation(s).

98. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 98 of the Compliant and therefore deny the allegation(s).

99. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 99 of the Complaint and therefore deny the allegation(s). Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 99 of the Complaint that the attached marked as Exhibit O is a true and correct copy of any agreement between the parties and therefore deny said allegations.

100. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 100 of the Complaint and therefore deny the allegation(s).

101. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 101 of the Complaint and therefore deny the allegation(s).

102. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 102 of the Complaint and therefore deny the allegation(s).

103. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 103 of the Complaint and therefore deny the allegation(s).

104. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 104 of the Complaint and therefore deny the allegation(s).

105. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 105 of the Complaint and therefore deny the allegation(s).

106. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 106 of the Complaint and therefore deny the allegation(s). Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 106 of the Complaint that the attached marked as Exhibit P is a true and correct copy of any agreement between the parties and therefore deny said allegations.

107. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 107 of the Complaint and therefore deny the allegation(s).

108. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 108 of the Complaint and therefore deny the allegation(s).

109. Defendants admit to entering into an agreement but unsure about the date of said agreement. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 109 of the Complaint regarding the authenticity of what Plaintiff claims are paragraphs of the Auction Agreement, therefore Defendants deny the allegations. Further, Defendants deny the allegations it represented and warranted as stated in Paragraph 109 of the Complaint.

110. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 110 of the Complaint that the attached marked as Exhibit Q is a true and correct copy of any agreement between the parties and therefore deny said allegations.

111. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 111 of the Complaint and therefore deny the allegation(s).

112. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 108 of the Complaint and therefore deny the allegation(s).

113. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 113 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

114. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 114 of the Complaint that the attached marked as Exhibit S is a true and correct copy of any agreement between the parties and therefore deny said allegations.

115. Defendants deny the allegations in Paragraph 115 of the Complaint.

116. Defendants deny the allegations in Paragraph 116 of the Complaint.

117. Defendants deny the allegations in Paragraph 117 of the Complaint.

118. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 118 of the Complaint that the attached marked as Exhibit O and Exhibit R are true and correct copies of any agreement between the parties and therefore deny said allegations.

119. Defendants deny the allegations in Paragraph 119 of the Complaint. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 119 of the Complaint that the attached marked as Exhibit R and

Exhibit S are true and correct copies of any agreement between the parties and therefore deny said allegations.

120. Defendants deny the allegations in Paragraph 120 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 120 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

121. Defendants deny the allegations in Paragraph 121 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 121 of the Complaint that the attached marked as Exhibit S is a true and correct copy of any agreement between the parties and therefore deny said allegations.

122. Defendants deny the allegations in Paragraph 122 of the Complaint.

123. Defendants deny the allegations in Paragraph 123 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 123 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

124. Defendants deny the allegations in Paragraph 124 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 124 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

125. Defendants deny the allegations in Paragraph 125 of the Complaint.

126. Defendants deny the allegations in Paragraph 126 of the Complaint.

127. Defendants deny the allegations in Paragraph 127 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the

truth of the allegations in Paragraph 127 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

128. Defendants deny the allegations in Paragraph 128 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 128 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

129. Defendants deny the allegations in Paragraph 129 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 129 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations. Defendants further deny Plaintiff's implication they are parties to any fraud as suggested by the Plaintiff's description of vehicles as AFC Fraud Vehicles.

130. Defendants deny the allegations in Paragraph 130 of the Complaint.

131. Defendants deny the allegations in Paragraph 131 of the Complaint.

132. Defendants deny the allegations in Paragraph 132 of the Complaint.

133. Defendants deny the allegations in Paragraph 133 of the Complaint.

134. Defendants deny the allegations in Paragraph 134 of the Complaint.

135. Defendants deny the allegations in Paragraph 135 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 135 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

136. Defendants deny the allegations in Paragraph 136 of the Complaint.

137. Defendants deny the allegations in Paragraph 137 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the

truth of the allegations in Paragraph 137 of the Complaint that the attached marked as Exhibit R and Exhibit S are true and correct copies of any agreement between the parties and therefore deny said allegations.

138. Defendants deny the allegations in Paragraph 138 of the Complaint.

139. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 135 of the Complaint that the attached marked as Exhibit S is a true and correct copy of any agreement between the parties and therefore deny said allegations.

140. Defendants deny the allegations in Paragraph 140 of the Complaint.

141. Defendants deny the allegations in Paragraph 141 of the Complaint.

142. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 142 of the Complaint and therefore deny the allegation(s)

143. Defendants deny the allegations in Paragraph 143 of the Complaint.

144. Defendants deny the allegations in Paragraph 144 of the Complaint. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 144 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

145. Defendants deny the allegations in Paragraph 145 of the Complaint.

146. Defendants deny the allegations in Paragraph 146 of the Complaint. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 146 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

147. Defendants deny the allegations in Paragraph 147 of the Complaint.

148. Defendants deny the allegations in Paragraph 148 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 148 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

149. Defendants deny the allegations in Paragraph 149 of the Complaint.

150. Defendants deny the allegations in Paragraph 150 of the Complaint.

151. Defendants deny the allegations in Paragraph 151 of the Complaint.

152. Defendants deny the allegations in Paragraph 152 of the Complain. Further, Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegations in Paragraph 152 of the Complaint that the attached marked as Exhibit R is a true and correct copy of any agreement between the parties and therefore deny said allegations.

153. Defendants deny the allegations in Paragraph 154 of the Complaint.

154. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 154 of the Compliant and therefore deny the allegation(s).

155. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 155 of the Compliant and therefore deny the allegation(s).

156. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 156 of the Compliant and therefore deny the allegation(s).

157. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 157 of the Compliant and therefore deny the allegation(s).

158. Paragraph 158 of the Complaint sets forth no allegations to which a response is required.

159. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 159 of the Complaint and therefore deny the allegation(s).

160. Paragraph 160 of the Complaint sets forth no allegations to which a response is required.

161. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 161 of the Complaint and therefore deny the allegation(s).

162. Paragraph 162 of the Complaint sets forth no allegations to which a response is required.

163. Paragraph 163 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendants deny Plaintiffs are entitled to the relief they seek.

164. Paragraph 164 of the Complaint sets forth no allegations to which a response is required.

165. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 165 of the Complaint and therefore deny the allegation(s).

166. Paragraph 166 of the Complaint sets forth no allegations to which a response is required.

167. Paragraph 167 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendants deny Plaintiffs are entitled to the relief they seek.

168. Paragraph 168 of the Complaint sets forth no allegations to which a response is required.

169. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 169 of the Complaint and therefore deny the allegation(s).

170. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 170 of the Complaint and therefore deny the allegation(s).

171. Paragraph 171 of the Complaint sets forth no allegations to which a response is required.

172. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 172 of the Complaint and therefore deny the allegation(s).

173. Defendants are without information or knowledge sufficient at this time to form a belief as to the truth of the allegation(s) in Paragraph 173 of the Complaint and therefore deny the allegation(s).

174. Paragraph 174 of the Complaint sets forth no allegations to which a response is required.

175. Paragraph 175 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendants deny Plaintiffs are entitled to the relief they seek.

176. Paragraph 176 of the Complaint sets forth no allegations to which a response is required.

177. Paragraph 177 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendants deny Plaintiffs are entitled to the relief they seek.

178. Paragraph 178 of the Complaint sets forth no allegations to which a response is required.

179. Defendants deny the allegations in Paragraph 179 of the Complaint.

180. Defendants deny the allegations in Paragraph 180 of the Complaint.

181. Defendants deny the allegations in Paragraph 181 of the Complaint.

182. Defendants deny the allegations in Paragraph 182 of the Complaint.

183. Paragraph 183 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendants deny Plaintiffs are entitled to the relief they seek.

184. Paragraph 184 of the Complaint sets forth no allegations to which a response is required.

185. Defendants deny the allegations in Paragraph 185 of the Complaint.

186. Defendants deny the allegations in Paragraph 186 of the Complaint.

187. Defendants deny the allegations in Paragraph 187 of the Complaint.

188. Defendants deny the allegations in Paragraph 188 of the Complaint.

189. Paragraph 189 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendants deny Plaintiffs are entitled to the relief they seek.

190. Paragraph 190 of the Complaint sets forth no allegations to which a response is required.

191. Paragraph 191 of the Complaint sets forth legal conclusions to which no response is required. To extent a response is required Defendants deny Plaintiffs are entitled to the relief they seek.

PRAYER

Defendants pray the Court, after notice and hearing or trial, enters judgment in favor of Defendants and/or dismissal of the Plaintiffs' claims with prejudice, awards Defendants the costs of court, attorney's fees, and such other and further relief as Defendants may be entitled to in law or in equity.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on October 7, 2020 a true and correct copy of this Answer was served in accordance to the Federal Rules of Procedure.

VIA ECF

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